

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**IN RE:**

**LEOLA MICHELLE MAY**

**NO. 23-01759 JAW**

**MOTION TO APPROVE AGREEMENT RELATING TO  
RELIEF FROM THE AUTOMATIC STAY**

Comes now Consumer Portfolio Services (“Consumer Portfolio”), by and through its counsel of record, Byrd & Wiser, and files this its Motion to Approve Agreement relating to Relief from Automatic Stay, and in support of same would show unto the Court the following, to-wit:

**I**

This Court has jurisdiction over the parties and the subject matter pursuant to 28 USC Section 1334. This Motion is a core proceeding pursuant to 28 USC Section 157(b)(2)(A),(G).

**II**

The instant case is a proceeding pursuant to Chapter 7 of the Bankruptcy Code.

**III**

The Movant and Debtor have reached an agreement providing for, inter alia, relief from the automatic stay provisions of Section 362 as to the Movant, Consumer Portfolio. A copy of the agreement, reflected in the form of an Agreed Order, is attached hereto as Exhibit "A".

**IV**

Pursuant to Rule 9014(b) and 7004(b)(9) of the Federal Rules of Bankruptcy Procedure, this Motion to Approve is served upon all necessary parties, and all necessary parties have approved the Agreement in the form of the Agreed Order attached hereto

WHEREFORE, premises considered, the Movant herein, would pray that this Court enter its Order granting Movant's Motion to Approve Agreement by approving and entering the Agreed Order attached hereto, and the Movant prays for such other and further relief as is just and proper

in the premises.

Respectfully submitted,

CONSUMER PORTFOLIO SERVICES

BY: BYRD & WISER

BY:

  
ROBERT ALAN BYRD, MSB#7651  
EMAIL: [rab@byrdwiser.com](mailto:rab@byrdwiser.com)

**CERTIFICATE**

I, ROBERT ALAN BYRD, Attorney for Consumer Portfolio Services, do hereby certify that I have this date transmitted via Electronic Case Filing, as it appears on this date in the court registered e-filers of CM/ECF and/or via U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing Motion to Approve Agreement relating to Relief from Automatic Stay to the following:

Jordan Ash, Attorney for Debtor, at [jordan@ashlaw.ms](mailto:jordan@ashlaw.ms)

Eileen Shaffer, Trustee, at [eshaffer@eshaffer-law.com](mailto:eshaffer@eshaffer-law.com)

Office of the U.S. Trustee, at [USTPRegion05.JA.ECF@usdoj.gov](mailto:USTPRegion05.JA.ECF@usdoj.gov)

This the 24<sup>th</sup> day of October, 2023.

  
ROBERT ALAN BYRD